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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

In Re Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

DORIS SINGLETON JONES, an
individual,

**JOINT NOTICE OF FILING JURY
INSTRUCTIONS**

Plaintiff,

(The Honorable David G. Campbell)

v.

C.R. BARD, INC., a New Jersey
corporation and BARD PERIPHERAL
VASCULAR, an Arizona corporation,

Defendants.

In accordance with the Court's Order and Civil Minutes (Docs. 10587, 10805), the Parties hereby submit the following jury instructions for review at the May 4, 2018, final pretrial conference:

1. Agreed Preliminary Jury Instructions (Exhibit A);

2. Agreed Final Jury Instructions (Exhibit B);

3. Plaintiff's Proposed Jury Instructions (Exhibit C);

4. Defendants' Proposed Jury Instructions (Exhibit D);

5. Comprehensive Final Jury Instructions with Competing Instructions (Exhibit E).
[The purpose of this document is to make it convenient for the Court and parties to have all of the instructions, including each party's proposed "competing" instructions in one place as the Court hears argument and considers which instructions to give.]

RESPECTFULLY SUBMITTED this 1st day of May, 2018.

GALLAGHER & KENNEDY, P.A.

SNELL & WILMER L.L.P.

By: /s/ Mark O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine